

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

U.S DEPARTMENT OF JUSTICE, *et al.*

Defendants.

**DECLARATION OF THOMAS ENGELS,
HEALTH RESOURCES AND SERVICES ADMINISTRATION,
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES**

I, Thomas Engels, make the following declaration under 28 U.S.C. § 1746:

1. I am the Administrator of the Health Resources and Services Administration (HRSA), a component of the U.S. Department of Health and Human Services (HHS).

2. In this role, I am responsible for leading HRSA, including administrative and programmatic oversight for its programs. Through this work, I am familiar with HRSA's Health Center Program and Health Workforce Programs, as referenced in the HHS Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) Notice, issued on July 14, 2025. 90 Fed. Reg. 31232.

3. I submit this declaration in support of the Defendants' Opposition to Plaintiffs' Motion for Preliminary Injunction in the above-captioned matter. Specifically, I submit this declaration to describe (i) the Federal public benefit provided by the Health Center Program and Health Workforce Programs; (ii) the general purpose of HHS's PRWORA Notice; and (iii)

HRSA's plans with respect to the issuance of program-specific guidance implementing the HHS PRWORA Notice.

4. This declaration is based on my personal knowledge, information acquired in the course of performing my official duties, information conveyed to me by current agency employees, and information contained in agency records to which I have access in the normal course of my duties.

5. In terms of Federal public benefits, HRSA's Health Center Program provides grant funds to private nonprofit organizations and public agencies to provide primary health services to residents of medically underserved catchment areas and to certain special medically underserved populations, as described in the program's authorizing statute, 42 U.S.C. § 254b.

6. HRSA's Bureau of Health Workforce (BHW) administers many health workforce grant programs under Titles VII and VIII of the PHS Act, 42 U.S.C. §§ 292q- 298d. Awards are provided to entities like health professions schools or community-based organizations that provide health professions training. Entities that receive health workforce grant funding provide federal benefits such as scholarships, stipends, or other financial support to individuals pursuing health professions careers.

7. HRSA's Health Center Program awards and health workforce grant programs authorized under Titles VII and VIII of the PHS Act are subject to monitoring and oversight pursuant to HHS grant regulations, currently found at 45 C.F.R. part 75, and starting on October 1, 2025, at 2 C.F.R. part 200. Grants management and program staff monitor the recipient's performance during the award cycle to ensure compliance and lessen the need for enforcement. However, when a recipient's compliance or performance may require additional action by the agency, consistent with 45 C.F.R. § 75.371 (and 2 C.F.R. § 200.339, as applicable) and pursuant

to internal HHS grants policy, prior to seeking termination for non-compliance, awarding agencies are required to try to improve recipient compliance through imposing specific conditions for corrective action (45 C.F.R. § 75.207), such as providing technical assistance, conducting site visits, imposing a corrective action plan, or including other special terms and conditions in the award. If these conditions are unsuccessful at improving recipient compliance or the agency determines that the non-compliance cannot be remedied by imposing specific conditions, 45 C.F.R. § 75.371 permits the awarding agency to initiate enforcement actions, up to and including termination.

8. To the best of my knowledge, the purpose of the HHS PRWORA Notice issued on July 14, 2025 was to provide notice and clarity regarding HHS’s interpretation and application of PRWORA, to identify HHS programs that provide “Federal public benefits within the scope of PRWORA,” to seek public comment, and to forecast potential forthcoming program-specific guidance implementing the HHS PRWORA Notice, as needed.

9. Presently, HRSA is deliberating whether program-specific guidance for the programs administered by HRSA is needed in light of the HHS PRWORA Notice.

Executed this 11th day of August 2025, in Washington, D.C.

Thomas J. Engels